

Exhibit B

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

JUUL LABS, INC.,

§
Plaintiff, §

v.

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§

Civil Action No. 1:19-cv-00715

THE UNINCORPORATED ASSOCIATIONS §
IDENTIFIED IN SCHEDULE A, Defendants. §

DEFENDANT'S FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

TO: Plaintiff Juul Labs, Inc., by ant through your attorney of record, Monica Riva Talley
Sterne Kessler Goldstein & Fox, P.L.L.C., 1100 New York Ave., N.W., Suite 600,
Washington, D.C. 20005-3934; mtalley@sternekessler.com

Pursuant to the Federal Rules of Civil Procedure, Defendant in the above-styled cause,
requests that Plaintiff Juul Labs, Inc. answer the following request for production in
accordance with the instructions and definitions stated below:

INSTRUCTIONS

1. Response Date: The answers or objections to these requests for production must be served upon Defendant within thirty-one (31) days after service on Plaintiff.
2. Supplementation: These requests require supplementation if you obtain further information between the time the answers are served and the time of trial.

DEFINITIONS

Unless otherwise noted, the following definitions shall be used in answering these Interrogatories:

1. "Document" refers to and includes every writing or record of any type and description that is in your possession, control or custody, including without limitation, correspondence, memoranda, interoffice communications, stenographic or hand written notes, drafts, studies, publications, invoices, ledgers, journals, books, records, accounts, pamphlets, voice recordings, reports, surveys, statistical compilations, work papers, data

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processing cards, computer tapes or printouts, or all copies of each which contain any other writing or recordings of any kind which does not appear on the original or on any other copy. To the extent that the information exists within a computer or a computer recorded medium, you are requested to reduce the information to paper copy.

3. "Identify" shall mean:
 - a. with respect to individuals: the name, address and telephone number of the individual;
 - b. with respect to a corporation or business entity: the name, address and telephone number of the business;
 - c. with respect to documents: the type of document, a brief description of the contents of the document, the date of the document, the person to whom the document was sent; and the name; address and telephone number of the present custodian of the document.
4. "Defendant" refers to Sibel Toy.
5. "You" or "your" refers to Plaintiff Juul Labs Inc..

CERTIFICATE OF SERVICE

I do certify that a true and correct copy of the forgoing document was served by electronic means on November ____, 2019 on Plaintiff's attorney of record: Monica Riva Talley, Sterne Kessler Goldstein & Fox, P.L.L.C., 1100 New York Ave., N.W., Suite 600, Washington, D.C. 20005-3934; mtalley@sternekessler.com

Sibel Toy, Pro Se
5007 Falcon Hollow Rd.
McKinney, Texas 75072
469-955-6282
Sibelnyc@gmail.com

PLAINTIFFS' FIRST REQUEST FOR PRODUCTION TO DEFENDANT

Please produce the following documents and things:

1. A copy of any documents that support your claim that Defendant violated any trademarks owned by you that are relevant to your complaint.

DEFENDANT'S FIRST REQUEST FOR PRODUCTION TO PLAINTIFF

2. A copy of any documents that support your claim that you purchased merchandise from Defendant is a trademark infringement.
3. A copy of any documents that show the date you claim you purchased merchandise from Defendant that you claim is counterfeit.
4. A copy of any documents that show that any merchandise you claim you purchased from Defendant is counterfeit.
5. A copy of any documents that show that any merchandise you claim you purchased from Defendant shows a false designation of origin.
6. A copy of all exhibits that you intends to offer at the trial of this case.